

EXHIBIT B

IN THE CIRCUIT COURT OF JACKSON COUNTY, MISSOURI

GERMANY SMITH,

Plaintiff,

v.

Case No:

DOLGENCORP, LLC, d/b/a
DOLLAR GENERAL STORE
#14255SERVE REGISTERED AGENT:
CSC-Lawyers Incorporating
Service Company
221 Bolivar Street
Jefferson City, MO 65101

AND

DERRICK WILLIAMS
SERVE AT:
3023 E 27TH ST,
KANSAS CITY, MO 64127-4127

Defendants.

PETITION FOR DAMAGES

COMES NOW Plaintiff Germany Smith and, for her cause of action against Defendants Derrick Williams ("Williams") and Dolgencorp, LLC d/b/a Dollar General Store #14255 ("Company"), states and alleges as follows:

JURISDICTION & VENUE

1. This action alleges that Defendant Williams committed assault and battery, arising under Missouri law in Jackson County, Missouri.
2. Plaintiff was first injured by Defendant Williams' unlawful assault in Jackson County, Missouri; as such, venue is proper in this Court pursuant to R.S.Mo. § 508.010.

3. This action alleges that Defendants engaged in unlawful discriminatory practices in violation of the Missouri Human Rights Act, R.S.Mo. §§ 213.010, *et seq.*

4. The unlawful discriminatory practices alleged herein occurred in Jackson County, Missouri, where Plaintiff was first injured by Defendant's unlawful conduct; as such, venue is proper in this Court pursuant to R.S.Mo. § 508.010.

PARTIES

5. Plaintiff is an African American female resident of Jackson County, Missouri.

6. Defendant Williams is an African American male resident of Jackson County, Missouri.

7. Defendant Company employs six or more persons, such that Defendant is an "employer" within the meaning of R.S.Mo. § 213.010(8).

CONDITIONS PRECEDENT

8. Plaintiff timely filed a Charge of Discrimination with the Kansas City Missouri Human Relations Department ("KCHRD") which was dually filed with the Equal Employment Opportunity Commission ("EEOC") on January 18, 2022 within 180 days of her termination, alleging discrimination based on race and/or color, as well as retaliation, as described in this petition.

9. Plaintiff's Charge of Discrimination was transferred from the KCHRD to the Missouri Commission on Human Rights ("MCHR").

10. Plaintiff received notice of her right to sue regarding the January 18, 2022, Charge of Discrimination from the MCHR by a letter dated January 19, 2023.

11. This Petition is being filed within 90 days of the MCHR's notification letter to Plaintiff and within two years of the occurrence or reasonable discovery of the unlawful employment practices alleged herein.

GENERAL ALLEGATIONS

12. Plaintiff began working for Defendant on or about December 15, 2021, at its location at 4235 Troost Avenue, Kansas City, Missouri ("Defendant's Store").

13. Defendant Derrick Williams ("Williams"), at all times relevant herein, was the store manager of Defendant's Store and Plaintiff's direct supervisor.

14. Throughout Plaintiff's employment, Defendant Williams sexually harassed Plaintiff.

15. During Plaintiff's interview, Defendant Williams commented about his marriage and sexual behavior.

16. Defendant Williams commented about sexual relations and "what he would do to [Plaintiff]."

17. Defendant Williams referred to himself as a "Nymphomaniac."

18. Defendant Williams volunteered that he was unfaithful in his marriage and told Plaintiff that it was because he did not receive enough sexual gratification from his wife.

19. Throughout Plaintiff's employment, Defendant Williams commented about Plaintiff's backside and her breasts.

20. Defendant Williams repeatedly asked Plaintiff if she was wearing underwear.

21. Defendant Williams offered Plaintiff money to have sexual intercourse with him.

22. Defendant Williams described to Plaintiff graphic sexual acts he wanted to observe Plaintiff perform or engage in.

23. Defendant Williams described sex acts he wanted to perform on Plaintiff and wanted to gauge her reaction to these sex acts.

24. On or about January 3, 2022, Defendant Williams hit Plaintiff with a green ruler on her backside.

25. Defendant Williams hit Plaintiff in a sexual act known as “spanking.”

26. Every time Plaintiff worked a shift, Defendant Williams also worked for some period of the same shift, except for December 23, 2021, to January 1, 2023, when Williams took time off work.

27. Each and every time Plaintiff saw Williams, Williams made one or more sexual remarks.

28. This commentary occurred throughout the Plaintiff’s eight-hour shifts and whenever a customer was not in close proximity.

29. Defendant Williams made comments suggesting that other female employees had been receptive to his sexual advances.

30. Plaintiff objected on multiple occasions to Defendant Williams about his comments and conduct and reported him to the District Manager on January 5, 2022.

31. Plaintiff has not heard anything from Defendant Company regarding her report since January 5, 2022.

32. To Plaintiff’s knowledge, Defendant Company has taken no corrective action against Defendant Williams, despite Plaintiff’s report about his misconduct.

33. Defendant Williams’ sexually vulgar comments were made based on and because of Plaintiff’s female sex.

34. Defendant Williams' daily vulgar comments toward Plaintiff were sufficiently severe and pervasive to create an intimidating, hostile, or offensive work environment or had the purpose or effect of unreasonably interfering with Plaintiff's work performance.

35. Such conduct subjects Defendant Company to liability for sexual harassment.

36. Defendant William's harassment affected a term, condition, or privilege of Plaintiff's employment in a manner sufficiently severe to create an abusive work environment.

37. The hostile work environment created and maintained by Defendant Company through Defendant Williams caused damage to Plaintiff in the form of emotional distress, mental anguish, humiliation, and embarrassment and ultimately led to Plaintiff's constructive discharge.

COUNT I

TORTIOUS ASSAULT & BATTERY AGAINST DEFENDANT WILLIAMS

38. Plaintiff hereby incorporates and re-alleges all previously alleged Paragraphs as if fully set forth herein.

39. At the time and place previously alleged, Defendant Williams committed a battery on Plaintiff by striking her on her backside, thereby causing contact with Plaintiff that was offensive to Plaintiff and that would be offensive to a reasonable person.

40. Defendant Williams' battery of Plaintiff was outside the scope of his responsibilities and role as her supervisor.

41. Defendant Williams' unlawful actions have damaged Plaintiff.

42. The actions of Defendant Williams, in committing a battery on Plaintiff, constituted willful and wanton conduct, and as such, Plaintiff is entitled to punitive damages.

WHEREFORE, Plaintiff prays for judgment in her favor against Defendant Williams for actual damages that are fair and reasonable, for punitive damages, for her costs, and for such other and further relief as the Court deems just and proper under the circumstances.

COUNT II

SEXUAL HARASSMENT/SEXUALLY HOSTILE WORK ENVIRONMENT
AGAINST DEFENDANT COMPANY

43. Plaintiff hereby incorporates all prior paragraphs as if fully set forth herein.

44. Plaintiff hereby alleges sexual harassment/sexual hostile work environment against Defendant Company.

45. Plaintiff's sex (female) was a motivating factor in Defendant Company's decisions to allow the existence of the aforementioned sexually hostile work environment directed at Plaintiff.

46. Defendant Company's actions, as noted above, constituted sexual harassment via the creation and allowed existence of a sexually hostile work environment to which Plaintiff was subjected in violation of the MHRA as Defendant Company and its supervisors (including the individually named Defendant) were aware of the illegal acts of its employees and managers, and did not take action to stop or prevent the acts that violated the Defendant Company workplace policy, as well as the Missouri Human Rights Act.

47. The sexual misconduct Plaintiff experienced created an intimidating, hostile, or offensive work environment, or had the purpose or effect of unreasonably interfering with Plaintiff's work performance.

48. Defendant Company's actions, as noted above, were discriminatory, continuous, arbitrary, and capricious and constituted a disparity in treatment toward Plaintiff, and her sex,

female, was a motivating factor in the creation and fostering of a sexually hostile work environment to which Plaintiff was subjected.

49. At the time these actions were taken by Defendant Company, Defendant Company knew that these actions were unlawful and Defendant Company's actions were undertaken maliciously and/or in reckless disregard for Plaintiff's right to be free from discrimination.

50. Plaintiff has been damaged by Defendant Company's unlawful employment actions.

WHEREFORE, Plaintiff prays for judgment in her favor against Defendant Company, for her fair and reasonable actual damages, for punitive damages, for reasonable attorneys' fees, for her costs, and for such other and further relief as the Court deems just and proper under the circumstances.

THE MEYERS LAW FIRM, LC
 By: /s/ EmmaLee A. Wilson
 Martin M. Meyers MO #29524
 mmeyers@meyerslaw.com
 EmmaLee A. Wilson MO #72195
 ewilson@meyerslaw.com
 4435 Main Street, Suite 503
 Kansas City, Missouri 64111
 (816) 444-8500
 (816) 444-8508 *facsimile*

ATTORNEYS FOR PLAINTIFF

**IN THE CIRCUIT COURT OF JACKSON COUNTY, MISSOURI
AT KANSAS CITY**

GERMANY SMITH,

**PLAINTIFF(S),
VS.**

**CASE NO. 2316-CV09221
DIVISION 11**

DOLGENCORP, LLC, D/B/A DOLLAR GENERAL STORE,

DEFENDANT(S).

**NOTICE OF CASE MANAGEMENT CONFERENCE FOR CIVIL CASE
AND ORDER FOR MEDIATION**

NOTICE IS HEREBY GIVEN that a Case Management Conference will be held with the Honorable **ADAM L. CAINE** on **03-AUG-2023** in **DIVISION 11** at **09:00 AM**. All Applications for Continuance of a Case Management Conference should be filed on or before Wednesday of the week prior to the case management setting. Applications for Continuance of a Case Management Conference shall comply with Supreme Court Rule and 16th Cir. R. 34.1. Continuance of a Case Management Conference will only be granted for good cause shown because it is the desire of the Court to meet with counsel and parties in all cases within the first 4 months that a case has been on file. All counsel and parties are directed to check Case.NET on the 16th Judicial Circuit web site at www.16thcircuit.org after filing an application for continuance to determine whether or not it has been granted.

A lead attorney of record must be designated for each party as required by Local Rule 3.5.1. A separate pleading designating the lead attorney of record shall be filed by each party as described in Local Rule 3.5.2. The parties are advised that if they do not file a separate pleading designating lead counsel, even in situations where there is only one attorney representing the party, JIS will not be updated by civil records department, and copies of orders will be sent to the address currently shown in JIS. Civil Records does not update attorney information from answers or other pleadings. The Designation of Lead Attorney pleading shall contain the name of lead counsel, firm name, mailing address, phone number, FAX number and E-mail address of the attorney who is lead counsel.

At the Case Management Conference, counsel should be prepared to address at least the following:

- a. A trial setting;
- b. Expert Witness Disclosure Cutoff Date;
- c. A schedule for the orderly preparation of the case for trial;
- d. Any issues which require input or action by the Court;
- e. The status of settlement negotiations.

MEDIATION

The parties are ordered to participate in mediation pursuant to Supreme Court Rule 17. Mediation shall be completed within 10 months after the date the case is filed for complex cases, and 6 months after the date the case is filed for other circuit cases, unless otherwise ordered by the Court. Each party shall personally appear at the mediation and participate in the process. In the event a party does not have the authority to enter into a settlement, then a representative of the entity that does have actual authority to enter into a settlement on behalf of the party shall also personally attend the mediations with the party.

The parties shall confer and select a mutually agreeable person to act as mediator in this case. If the parties are unable to agree on a mediator the court will appoint a mediator at the Case Management Conference.

Each party shall pay their respective pro-rata cost of the mediation directly to the mediator.

POLICIES/PROCEDURES

Please refer to the Court's web page www.16thcircuit.org for division policies and procedural information listed by each judge.

/S/ ADAM L. CAINE

ADAM L. CAINE, Circuit Judge

Certificate of Service

This is to certify that a copy of the foregoing was mailed postage pre-paid or hand delivered to the plaintiff with the delivery of the file-stamped copy of the petition. It is further certified that a copy of the foregoing will be served with the summons on each defendant named in this action.

Attorney for Plaintiff(s):

EMMALEE ANN WILSON, 4435 MAIN ST, SUITE 503, KANSAS CITY, MO 64111

MARTIN MEYERS, 4435 MAIN ST, SUITE 503, KANSAS CITY, MO 64111

Defendant(s):

DOLGENCORP, LLC, D/B/A DOLLAR GENERAL STORE
DERRICK WILLIAMS

Dated: 05-APR-2023

BEVERLY A. NEWMAN
Court Administrator

IN THE CIRCUIT COURT OF JACKSON COUNTY, MISSOURI

☒ AT KANSAS CITY ☐ AT INDEPENDENCE

RE: GERMANY SMITH V DOLGENCORP, LLC, D/B/A DOLLA ET AL
CASE NO: 2316-CV09221

TO: EMMALEE ANN WILSON
4435 MAIN ST
SUITE 503
KANSAS CITY, MO 64111

We have received pleadings, which you submitted for filing in the case and they have been file-stamped on APRIL 4, 2023. However, your pleading cannot be processed further until the following action is taken:

RULE 3.2 - STYLE

- ☐ Additional service instructions are needed.
- ☐ Incorrect case number/filed in wrong county.
- ☐ Document is unreadable.

RULE 4.2 (2)

- ☐ Need Circuit Court Form 4

RULE 5.6 – COLLECTIONS OF DEPOSIT

- ☐ No fee, or incorrect fee, received; fee required is \$_____.
- ☐ Insufficient Filing Fee; Please Remit \$_____
- ☐ No signature on check/form 1695.
- ☐ No request to proceed in forma pauperis.
- ☐ No personal checks accepted.

RULE 68.1

- ☐ Need Circuit Court Form 17

RULE 68.7 – VITAL STATISTICS REPORT

- ☐ Need Certificate of dissolution of marriage form.

RULE 74.14 SUPREME CT – FOREIGN JUDGMENT

- ☐ Authentication of foreign judgment required.
- ☐ Affidavit pursuant to Supreme Court Rule 74.14

RULE 54.12 SERVICE IN REM OR QUASI IN REM ACTIONS

- ☐ Affidavit for Service by Publication required pursuant to Supreme Court Rule 54.12c.
- ☐ Order for Service by Publication required pursuant to Supreme Court Rule 54.12c.
- ☐ Notice for Service by Publication required pursuant to Supreme Court Rule 54.12c.
- ☐ Affidavit for Service by Certified/Registered Mail pursuant to Supreme Court Rule 54.12b.

☒ **OTHER: PLEASE SEND SERVICE INSTRUCTIONS FOR THE 2ND DEFENDANT. YOU HAVE ONLY PAID CIVIL PROCESS FEES FOR 1 DEFENDANT. YOU WOULD HAVE TO PAY ANOTHER \$36 FOR THE 2ND DFT, IF YOU ARE WANTING TO USE CIVIL PROCESS. QUESTIONS, CALL SWAR @ 816-881-3973.**

- ☒ Please take the actions necessary to comply with the Circuit Court Rules and your request will be processed.
- ☐ The private process server listed is not on our approved list.
- ☐ Execution in effect. Return date _____. Request may be resubmitted within one week prior to return date.
- ☐ Supreme Court Rule 90.13 requires interrogatories be served with summons of garnishment.

If the filing was a new case, please be advised that unless the additional information marked is received within 30 days of the date of this notice this case will be dismissed pursuant to Rule 37.4 for failure to prosecute without prejudice, at the Plaintiff's cost. Collection efforts will be pursued for these costs.

Please refer to the Court's website at www.16thcircuit.org for Court Rules or Forms.

Copies electronic noticed, faxed, emailed and/or mailed APRIL 5, 2023 to:

COURT ADMINISTRATOR'S OFFICE
DEPARTMENT OF CIVIL RECORDS
CIRCUIT COURT OF JACKSON COUNTY, MISSOURI

APRIL 5, 2023

Date

By



Deputy Court Administrator

- ☒ 415 East 12th St., Kansas City, Missouri 64106
- ☐ 308 W. Kansas, Independence, Missouri 64050

AFFIDAVIT OF SERVICE

State of Missouri

County of Jackson

Circuit Court

Case Number: 2316-CV09221



POW2023006445

Plaintiff:
GERMANY SMITH

vs.

Defendant:
DOLGENCORP LLC D/B/A DOLLAR GENERAL STORE #14255 AND DERRICK WILLIAMS

For:
MEYERS LAW FIRM
4435 Main Street
503 One Main Plaza
Kansas City, MO 64111

Received by D & B Legal Services, Inc. on the 17th day of May, 2023 at 3:19 pm to be served on **DERRICK WILLIAMS, 3023 E 27TH ST, KANSAS CITY, MO 64127.**

I, Andrew Wickliffe PPS23-0203, being duly sworn, depose and say that on the **1st day of June, 2023 at 12:56 pm, I:**

INDIVIDUALLY/PERSONALLY served by delivering a true copy of the **Summons in Civil Case, Notice of Case Management Conference for Civil Case and Order for Mediation and Petition For Damages** with the date and hour of service endorsed thereon by me, to: **DERRICK WILLIAMS** at the alternate address of: **DOLLAR GENERAL, 5000 LINWOOD BLVD, KANSAS CITY, MO 64128.**

I certify that I am over the age of 18 and have no interest in the above action and the foregoing statements made by me are true and correct.

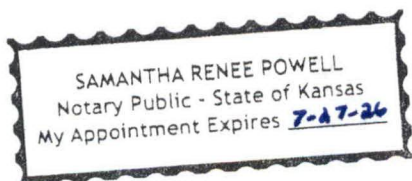
Subscribed and Sworn to before me on the 7th day of June, 2023

Andrew Wickliffe PPS23-0203
Process Server

D & B Legal Services, Inc.
P.O. Box 7471
Overland Park, KS 66207
(913) 362-8110

Our Job Serial Number: POW-2023006445

NOTARY PUBLIC





IN THE 16TH JUDICIAL CIRCUIT COURT, JACKSON COUNTY, MISSOURI

Judge or Division: JERRI J ZHANG	Case Number: 2316-CV09221
Plaintiff/Petitioner: GERMANY SMITH	Plaintiff's/Petitioner's Attorney/Address EMMALEE ANN WILSON 4435 MAIN ST SUITE 503 KANSAS CITY, MO 64111
Defendant/Respondent: DOLGENCORP, LLC, D/B/A DOLLAR GENERAL STORE	Court Address: 415 E 12th KANSAS CITY, MO 64106
Nature of Suit: CC Employmnt Discrmntn 213.111	(Date File Stamp)

Summons in Civil Case

The State of Missouri to: DERRICK WILLIAMS Alias: 3023 E 27TH ST KANSAS CITY, MO 64127	PRIVATE PROCESS SERVER 5307 PERSIMMON TRL #12 KANSAS CITY, MO 64129
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COURT SEAL OF



JACKSON COUNTY

You are summoned to appear before this court and to file your pleading to the petition, a copy of which is attached, and to serve a copy of your pleading upon the attorney for plaintiff/petitioner at the above address all within 30 days after receiving this summons, exclusive of the day of service. If you fail to file your pleading, judgment by default may be taken against you for the relief demanded in the petition.

16-MAY-2023
Date

Clerk

Further Information:

Sheriff's or Server's Return

Note to serving officer: Summons should be returned to the court within 30 days after the date of issue.

I certify that I have served the above Summons by: (check one)

- ☐ delivering a copy of the summons and petition to the defendant/respondent.
☐ leaving a copy of the summons and petition at the dwelling place or usual abode of the defendant/respondent with _____ a person at least 18 years of age residing therein.
☐ (for service on a corporation) delivering a copy of the summons and petition to _____

_____ (name) _____ (title).

☐ other _____

Served at _____ (address)

in _____ (County/City of St. Louis), MO, on _____ (date) at _____ (time).

Printed Name of Sheriff or Server

(Seal)

Signature of Sheriff or Server

Must be sworn before a notary public if not served by an authorized officer:

Subscribed and sworn to before me on _____ (date).

My commission expires: _____ Date _____ Notary Public

Sheriff's Fees

Summons \$ _____
Non Est \$ _____
Sheriff's Deputy Salary \$ _____
Supplemental Surcharge \$ 10.00
Mileage \$ _____ (_____ miles @ \$ _____ per mile)
Total \$ _____

A copy of the summons and petition must be served on each defendant/respondent. For methods of service on all classes of suits, see Supreme Court Rule 54.

IN THE CIRCUIT COURT OF JACKSON COUNTY, MISSOURI☒ AT KANSAS CITY☐ AT INDEPENDENCEGERMANY SMITHNO. 2316-CV09221

VS.

☒ CIRCUIT JUDGE☐ ASSOCIATE CIRCUIT JUDGEDOLGENCORP, LLC, et al.☐ SMALL CLAIMS**MEMORANDUM TO DEPARTMENT OF CIVIL RECORDS**
INSTRUCTIONS FOR ALIAS SUMMONS☒ PRIVATE PROCESS☐ CIVIL PROCESS☒ ISSUE ALIAS SUMMONS TO DEFENDANTDerrick Williams3023 E. 27th St., Kansas City, MO 64127OR 5307 Persimmon Trl #12, Kansas City, MO 64129Jackson

COUNTY OF SERVICE

CASE CONTINUED TO: _____

☐ PREPARE TRANSCRIPT OF JUDGMENT☐ AUTHENTICATED ☐ CERTIFIED ☐ RECORD AS LIEN
☐ W/LETTER**REQUESTED BY**Martin M. Meyers #29524NAME OF ☐ CREDITOR ☒ ATTORNEY & BAR NO.4435 Main St., Suite 503

ADDRESS

Kansas City, MO 64111

CITY

STATE

ZIP

/s/ Martin M. Meyers

SIGNATURE

(816) 444-8500

PHONE

April 10, 2023

DATE

Please Provide Original & Copy

IN THE CIRCUIT COURT OF JACKSON COUNTY, MISSOURI

GERMANY SMITH,)	
Plaintiff,)	
v.)	Case No.: 2316-CV09221
DOLGENCORP, LLC, et al.,)	
Defendants.)	

MOTION FOR APPROVAL AND APPOINTMENT OF PRIVATE PROCESS SERVER

COMES NOW Plaintiff, by and through its attorney of record, and for its Motion for Approval/Appoint of Private Process Server, and requests that D&B Legal Services, Inc.: Legal Names (s):

Alisha Allen PPS23-0003	Rufus Harmon PPS23-0358	Bill Powell PPS23-0141
Sallie Bailey PPS23-0222	Stephen Heitz PPS23-0269	Dee Powell PPS23-0142
Carl Barnett PPS23-0007	Bridgette Hight PPS23-0074	Samantha Powell PPS23-0143
Thomas Bogue PPS23-0015	James Hise PPS23-0075	Curtiss Press PPS23-0145
Scott Brady PPS23-0018	Jennifer Hyman PPS23-0082	Kenneth Prewett PPS23-0146
Randy Burrow PPS23-0022	Patrick D Jones PPS23-0086	Benjamin Purser PPS23-0148
Gary Burt PPS23-0023	Chelsey Ketron PPS23-0087	Mark Rauss PPS23-0314
Steven Butcher PPS23-0234	Leisa Ketron PPS23-0088	Kathy Rulo PPS23-0165
Bobby Calvert PPS23-0026	Brent Kirkhart PPS23-0089	Edna Russell PPS23-0166
Carolyn Champlin PPS23-0029	Janice Kirkhart PPS23-0090	Westley Seifert PPS23-0168
Matthew Church PPS23-0350	Tyler Kirkhart PPS23-0091	Joe Sherrod PPS23-0169
Glen Cobb PPS23-0030	Cody Kyser PPS23-0093	Thomas Skinner PPS23-0174
Monica Cobbs PPS23-0031	Kenneth Marshall PPS23-0454	Anthony Spada PPS23-0179
Kory Crawshaw PPS23-0448	Michael C Meador PPS23-0111	Barbara Steil PPS23-0182
David Dice PPS23-0353	Maria Meier PPS23-0402	Jessica Stone PPS23-0406
Christopher Drummond PPS23-0249	Heather Merfen PPS23-0115	Randy Stone PPS23-0184
Anthony Dunne PPS23-0251	Matthew Millhollin PPS23-0117	Sonja Stone PPS23-0185
William Ferrell PPS23-0258	Corbin Monie PPS23-0118	Daniel Swinney PPS23-0190
Brandon Fisher PPS23-0053	Jason Moody PPS23-0456	Ryan E Weekley PPS23-0199
James Frago PPS23-0054	Wayne Mullen PPS23-0457	Ryan M Weekley PPS23-200
John Frago PPS23-0055	Jeremy Nicholas PPS23-0119	Robert Weishar PPS23-0201
Bradley Gordon PPS23-0059	Michael Noble PPS23-0123	Andrew Wickliffe PPS23-0203
Thomas Gorgen PPS23-0060	Greg Noll PPS23-0124	Gregory Willing PPS23-0206
Daniel Grubbs PPS23-0394	Cody Patton PPS23-0133	Conni Wilson PPS23-0208
Darnell Hamilton PPS23-0066	Mike Perry PPS23-0135	Lana Wiseman PPS23-0209
James Hannah PPS23-0067	Carrie Pfeifer PPS23-0137	Andrew Wheeler PPS23-0462
	Elizabeth Phillips PPS23-0309	Greg Zotta PPS23-0344
	Craig Poese PPS23-0138	

who are qualified persons to serve process, are not parties to the case and are not less than eighteen (18) years of age, as private process servers in the above cause to serve process in this case.

THE MEYERS LAW FIRM, LC

By: /s/ Marti M. Meyers

Martin M. Meyers MO #29524

mmeyers@meyerslaw.com

EmmaLee A. Wilson MO #72195
ewilson@meyerslaw.com
4435 Main Street
Suite 503
Kansas City, Missouri 64111
(816) 444-8500
(816) 444-8508 *facsimile*

ATTORNEYS FOR PLAINTIFF

ORDER

It is hereby ordered that the Plaintiff's Motion for Approval and Appointment of private process server is granted and the above-named individuals are hereby approved and appointed to serve process in the above-captioned matter.

Date: _____


Judge or Clerk



IN THE 16TH JUDICIAL CIRCUIT COURT, JACKSON COUNTY, MISSOURI

Judge or Division: JERRI J ZHANG	Case Number: 2316-CV09221
Plaintiff/Petitioner: GERMANY SMITH	Plaintiff's/Petitioner's Attorney/Address EMMALEE ANN WILSON 4435 MAIN ST SUITE 503 KANSAS CITY, MO 64111
Defendant/Respondent: DOLGENCORP, LLC, D/B/A DOLLAR GENERAL STORE	Court Address: 415 E 12th KANSAS CITY, MO 64106
Nature of Suit: CC Employmnt Discrmntn 213.111	(Date File Stamp)

Summons in Civil Case

The State of Missouri to: DERRICK WILLIAMS Alias: 3023 E 27TH ST KANSAS CITY, MO 64127		5307 PERSIMMON TRL #12 KANSAS CITY, MO 64129
 COURT SEAL OF CIRCUIT COURT OF MISSOURI JACKSON COUNTY	<p>You are summoned to appear before this court and to file your pleading to the petition, a copy of which is attached, and to serve a copy of your pleading upon the attorney for plaintiff/petitioner at the above address all within 30 days after receiving this summons, exclusive of the day of service. If you fail to file your pleading, judgment by default may be taken against you for the relief demanded in the petition.</p> <p><u>11-APR-2023</u> Date</p> <p><u>[Signature]</u> Clerk</p>	

Sheriff's or Server's Return Note to serving officer: Summons should be returned to the court within 30 days after the date of issue. I certify that I have served the above Summons by: (check one) <input type="checkbox"/> delivering a copy of the summons and petition to the defendant/respondent. <input type="checkbox"/> leaving a copy of the summons and petition at the dwelling place or usual abode of the defendant/respondent with _____ a person at least 18 years of age residing therein. <input type="checkbox"/> (for service on a corporation) delivering a copy of the summons and petition to _____ (name) _____ (title). <input type="checkbox"/> other _____ Served at _____ (address) in _____ (County/City of St. Louis), MO, on _____ (date) at _____ (time). _____ Printed Name of Sheriff or Server (Seal)		Signature of Sheriff or Server Must be sworn before a notary public if not served by an authorized officer: Subscribed and sworn to before me on _____ (date). My commission expires: _____ Date Notary Public
--	--	---

Sheriff's Fees Summons \$ _____ Non Est \$ _____ Sheriff's Deputy Salary Supplemental Surcharge \$ 10.00 Mileage \$ _____ (_____ miles @ \$._____ per mile) Total \$ _____ A copy of the summons and petition must be served on each defendant/respondent. For methods of service on all classes of suits, see Supreme Court Rule 54.	
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SUMMONS/GARNISHMENT SERVICE PACKETS ATTORNEY INFORMATION

Under the Missouri e-filing system now utilized by the 16th Judicial Circuit Court, once a case has been accepted for filing, a clerk prepares the necessary documents for service. The summons/garnishment is sent to the attorney by an e-mail containing a link so that the filer may print and deliver the summons/garnishment, pleadings and any other necessary documents to the person designated to serve the documents.

Pursuant to State statutes, Supreme Court Rules and Local Court Rules, attorneys are required to print, attach and serve specific documents with certain types of Petitions and other filings.

Please refer to the Court's website for instructions on how to assemble the service packets at:

16thcircuit.org → Electronic Filing Information → Required Documents for Service – eFiled cases → Summons/Garnishment Service Packet Information.

Please review this information periodically, as revisions are frequently made. Thank you.

Circuit Court of Jackson County



IN THE 16TH JUDICIAL CIRCUIT COURT, JACKSON COUNTY, MISSOURI

Judge or Division: ADAM CAINE	Case Number: 2316-CV09221
Plaintiff/Petitioner: GERMANY SMITH	Plaintiff's/Petitioner's Attorney/Address EMMALEE ANN WILSON 4435 MAIN ST SUITE 503 KANSAS CITY, MO 64111
Defendant/Respondent: DOLGENCORP, LLC, D/B/A DOLLAR GENERAL STORE	Court Address: 415 E 12th KANSAS CITY, MO 64106
Nature of Suit: CC Employmnt Discrmntn 213.111	


(Date File Stamp)

Summons in Civil Case

The State of Missouri to: DOLGENCORP, LLC, D/B/A DOLLAR GENERAL STORE

Alias:
CSC LAWYERS INCORPORATING SERV
221 BOLIVAR STREET
JEFFERSON CITY, MO 65101

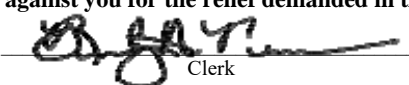
PRIVATE PROCESS SERVER



COURT SEAL OF
CIRCUIT COURT OF MISSOURI
JACKSON COUNTY

You are summoned to appear before this court and to file your pleading to the petition, a copy of which is attached, and to serve a copy of your pleading upon the attorney for plaintiff/petitioner at the above address all within 30 days after receiving this summons, exclusive of the day of service. If you fail to file your pleading, judgment by default may be taken against you for the relief demanded in the petition.

11-APR-2023
Date


Clerk

Further Information:

Sheriff's or Server's Return

Note to serving officer: Summons should be returned to the court within 30 days after the date of issue.

I certify that I have served the above Summons by: (check one)

☐ delivering a copy of the summons and petition to the defendant/respondent.

☐ leaving a copy of the summons and petition at the dwelling place or usual abode of the defendant/respondent with _____ a person at least 18 years of age residing therein.

☐ (for service on a corporation) delivering a copy of the summons and petition to _____ (name) _____ (title).

☐ other _____.

Served at _____ (address)

in _____ (County/City of St. Louis), MO, on _____ (date) at _____ (time).

Printed Name of Sheriff or Server
(Seal)

Signature of Sheriff or Server

Must be sworn before a notary public if not served by an authorized officer:

Subscribed and sworn to before me on _____ (date).

My commission expires: _____ Date _____ Notary Public

Sheriff's Fees

Summons \$ _____

Non Est \$ _____

Sheriff's Deputy Salary \$ _____

Supplemental Surcharge \$ 10.00

Mileage \$ _____ (_____ miles @ \$. _____ per mile)

Total \$ _____

A copy of the summons and petition must be served on **each** defendant/respondent. For methods of service on all classes of suits, see Supreme Court Rule 54.

SUMMONS/GARNISHMENT SERVICE PACKETS ATTORNEY INFORMATION

Under the Missouri e-filing system now utilized by the 16th Judicial Circuit Court, once a case has been accepted for filing, a clerk prepares the necessary documents for service. The summons/garnishment is sent to the attorney by an e-mail containing a link so that the filer may print and deliver the summons/garnishment, pleadings and any other necessary documents to the person designated to serve the documents.

Pursuant to State statutes, Supreme Court Rules and Local Court Rules, attorneys are required to print, attach and serve specific documents with certain types of Petitions and other filings.

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Please review this information periodically, as revisions are frequently made. Thank you.

Circuit Court of Jackson County

IN THE CIRCUIT COURT OF JACKSON COUNTY, MISSOURI

GERMANY SMITH,)	
Plaintiff,)	
v.)	Case No.: 2316-CV09221
DOLGENCORP, LLC, et al.,)	
Defendants.)	

MOTION FOR APPROVAL AND APPOINTMENT OF PRIVATE PROCESS SERVER

COMES NOW Plaintiff, by and through its attorney of record, and for its Motion for Approval/Appoint of Private Process Server, and requests that D&B Legal Services, Inc.: Legal Names (s):

Alisha Allen PPS23-0003	Rufus Harmon PPS23-0358	Bill Powell PPS23-0141
Sallie Bailey PPS23-0222	Stephen Heitz PPS23-0269	Dee Powell PPS23-0142
Carl Barnett PPS23-0007	Bridgette Hight PPS23-0074	Samantha Powell PPS23-0143
Thomas Bogue PPS23-0015	James Hise PPS23-0075	Curtiss Press PPS23-0145
Scott Brady PPS23-0018	Jennifer Hyman PPS23-0082	Kenneth Prewett PPS23-0146
Randy Burrow PPS23-0022	Patrick D Jones PPS23-0086	Benjamin Purser PPS23-0148
Gary Burt PPS23-0023	Chelsey Ketron PPS23-0087	Mark Rauss PPS23-0314
Steven Butcher PPS23-0234	Leisa Ketron PPS23-0088	Kathy Rulo PPS23-0165
Bobby Calvert PPS23-0026	Brent Kirkhart PPS23-0089	Edna Russell PPS23-0166
Carolyn Champlin PPS23-0029	Janice Kirkhart PPS23-0090	Westley Seifert PPS23-0168
Matthew Church PPS23-0350	Tyler Kirkhart PPS23-0091	Joe Sherrod PPS23-0169
Glen Cobb PPS23-0030	Cody Kyser PPS23-0093	Thomas Skinner PPS23-0174
Monica Cobbs PPS23-0031	Kenneth Marshall PPS23-0454	Anthony Spada PPS23-0179
Kory Crawshaw PPS23-0448	Michael C Meador PPS23-0111	Barbara Steil PPS23-0182
David Dice PPS23-0353	Maria Meier PPS23-0402	Jessica Stone PPS23-0406
Christopher Drummond PPS23-0249	Heather Merfen PPS23-0115	Randy Stone PPS23-0184
Anthony Dunne PPS23-0251	Matthew Millhollin PPS23-0117	Sonja Stone PPS23-0185
William Ferrell PPS23-0258	Corbin Monie PPS23-0118	Daniel Swinney PPS23-0190
Brandon Fisher PPS23-0053	Jason Moody PPS23-0456	Ryan E Weekley PPS23-0199
James Frago PPS23-0054	Wayne Mullen PPS23-0457	Ryan M Weekley PPS23-200
John Frago PPS23-0055	Jeremy Nicholas PPS23-0119	Robert Weishar PPS23-0201
Bradley Gordon PPS23-0059	Michael Noble PPS23-0123	Andrew Wickliffe PPS23-0203
Thomas Gorgen PPS23-0060	Greg Noll PPS23-0124	Gregory Willing PPS23-0206
Daniel Grubbs PPS23-0394	Cody Patton PPS23-0133	Conni Wilson PPS23-0208
Darnell Hamilton PPS23-0066	Mike Perry PPS23-0135	Lana Wiseman PPS23-0209
James Hannah PPS23-0067	Carrie Pfeifer PPS23-0137	Andrew Wheeler PPS23-0462
	Elizabeth Phillips PPS23-0309	Greg Zotta PPS23-0344
	Craig Poese PPS23-0138	

who are qualified persons to serve process, are not parties to the case and are not less than eighteen (18) years of age, as private process servers in the above cause to serve process in this case.

THE MEYERS LAW FIRM, LC

By: /s/ Marti M. Meyers

Martin M. Meyers MO #29524

mmeyers@meyerslaw.com

EmmaLee A. Wilson MO #72195
ewilson@meyerslaw.com
4435 Main Street
Suite 503
Kansas City, Missouri 64111
(816) 444-8500
(816) 444-8508 *facsimile*

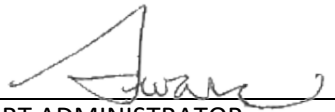
ATTORNEYS FOR PLAINTIFF

ORDER

It is hereby ordered that the Plaintiff's Motion for Approval and Appointment of private process server is granted and the above-named individuals are hereby approved and appointed to serve process in the above-captioned matter.

04/11/2023

DEPUTY COURT ADMINISTRATOR

A handwritten signature in black ink, appearing to read "A. Wilson", is written over a horizontal line.




IN THE 16TH JUDICIAL CIRCUIT COURT, JACKSON COUNTY, MISSOURI

Judge or Division: JERRI J ZHANG	Case Number: 2316-CV09221
Plaintiff/Petitioner: GERMANY SMITH	Plaintiff's/Petitioner's Attorney/Address EMMALEE ANN WILSON 4435 MAIN ST SUITE 503 KANSAS CITY, MO 64111
Defendant/Respondent: DOLGENCORP, LLC, D/B/A DOLLAR GENERAL STORE	Court Address: 415 E 12th KANSAS CITY, MO 64106
Nature of Suit: CC Employmnt Discrmntn 213.111	

(Date File Stamp)

Summons in Civil Case

The State of Missouri to: DERRICK WILLIAMS Alias: 3023 E 27TH ST KANSAS CITY, MO 64127	PRIVATE PROCESS SERVER 5307 PERSIMMON TRL #12 KANSAS CITY, MO 64129
--	--

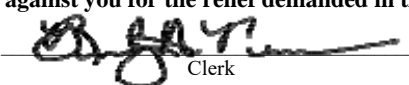


COURT SEAL OF
JACKSON COUNTY

You are summoned to appear before this court and to file your pleading to the petition, a copy of which is attached, and to serve a copy of your pleading upon the attorney for plaintiff/petitioner at the above address all within 30 days after receiving this summons, exclusive of the day of service. If you fail to file your pleading, judgment by default may be taken against you for the relief demanded in the petition.

16-MAY-2023
Date

Further Information:



Clerk

Sheriff's or Server's Return

Note to serving officer: Summons should be returned to the court within 30 days after the date of issue.

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☐ (for service on a corporation) delivering a copy of the summons and petition to _____ (name) _____ (title).

☐ other _____.

Served at _____ (address)

in _____ (County/City of St. Louis), MO, on _____ (date) at _____ (time).

Printed Name of Sheriff or Server
 (Seal)

Signature of Sheriff or Server

Must be sworn before a notary public if not served by an authorized officer:

Subscribed and sworn to before me on _____ (date).

My commission expires: _____ Date _____ Notary Public

Sheriff's Fees	
Summons	\$ _____
Non Est	\$ _____
Sheriff's Deputy Salary	
Supplemental Surcharge	\$ 10.00
Mileage	\$ _____ (_____ miles @ \$. _____ per mile)
Total	\$ _____

A copy of the summons and petition must be served on **each** defendant/respondent. For methods of service on all classes of suits, see Supreme Court Rule 54.

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Circuit Court of Jackson County




IN THE 16TH JUDICIAL CIRCUIT COURT, JACKSON COUNTY, MISSOURI

Judge or Division: JERRI J ZHANG	Case Number: 2316-CV09221
Plaintiff/Petitioner: GERMANY SMITH	Plaintiff's/Petitioner's Attorney/Address EMMALEE ANN WILSON 4435 MAIN ST SUITE 503 KANSAS CITY, MO 64111
Defendant/Respondent: DOLGENCORP, LLC, D/B/A DOLLAR GENERAL STORE	Court Address: 415 E 12th KANSAS CITY, MO 64106
Nature of Suit: CC Employmnt Discrmntn 213.111	(Date File Stamp)

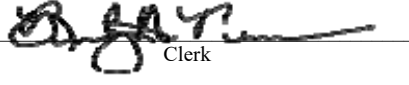
Summons in Civil Case

The State of Missouri to: DOLGENCORP, LLC, D/B/A DOLLAR GENERAL STORE
Alias:
CSC LAWYERS INCORPORATING SERV
221 BOLIVAR STREET
JEFFERSON CITY, MO 65101

COURT SEAL OF

JACKSON COUNTY

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16-MAY-2023
Date


Clerk

Further Information:

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☐ leaving a copy of the summons and petition at the dwelling place or usual abode of the defendant/respondent with _____ a person at least 18 years of age residing therein.

☐ (for service on a corporation) delivering a copy of the summons and petition to _____ (name) _____ (title).

☐ other _____.

Served at _____ (address)

in _____ (County/City of St. Louis), MO, on _____ (date) at _____ (time).

Printed Name of Sheriff or Server

Signature of Sheriff or Server

(Seal) **Must be sworn before a notary public if not served by an authorized officer:**

Subscribed and sworn to before me on _____ (date).

My commission expires: _____ Date _____ Notary Public

Sheriff's Fees

Summons \$ _____

Non Est \$ _____

Sheriff's Deputy Salary \$ _____

Supplemental Surcharge \$ 10.00

Mileage \$ _____ (_____ miles @ \$._____ per mile)

Total \$ _____

A copy of the summons and petition must be served on **each** defendant/respondent. For methods of service on all classes of suits, see Supreme Court Rule 54.

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Circuit Court of Jackson County

IN THE CIRCUIT COURT OF JACKSON COUNTY, MISSOURI

☒ AT KANSAS CITY

☐ AT INDEPENDENCE

GERMANY SMITH

NO. 2316-CV09221

VS.

☒ CIRCUIT JUDGE

☐ ASSOCIATE CIRCUIT JUDGE

DOLGENCORP, LLC, et al.

☐ SMALL CLAIMS

MEMORANDUM TO DEPARTMENT OF CIVIL RECORDS
INSTRUCTIONS FOR ALIAS SUMMONS

☒ PRIVATE PROCESS

☐ CIVIL PROCESS

☒ ISSUE ALIAS SUMMONS TO DEFENDANT

Derrick Williams

3023 E. 27th St., Kansas City, MO 64127

OR 5307 Persimmon Trl #12, Kansas City, MO 64129

Jackson

COUNTY OF SERVICE

CASE CONTINUED TO:

☐ PREPARE TRANSCRIPT OF JUDGMENT

☐ AUTHENTICATED ☐ CERTIFIED ☐ RECORD AS LIEN
☐ W/LETTER

REQUESTED BY

Martin M. Meyers #29524

NAME OF ☐ CREDITOR ☒ ATTORNEY & BAR NO.

4435 Main St., Suite 503

ADDRESS

Kansas City, MO 64111

CITY

STATE

ZIP

/s/ Martin M. Meyers

SIGNATURE

(816) 444-8500

PHONE

May 16, 2023

DATE

Please Provide Original & Copy

IN THE CIRCUIT COURT OF JACKSON COUNTY, MISSOURI☒ AT KANSAS CITY☐ AT INDEPENDENCE

GERMANY SMITH

NO. 2316-cv09221

VS.

☒ CIRCUIT JUDGE☐ ASSOCIATE CIRCUIT JUDGE

DOLGENCORP, LLC, d/b/a DOLLAR GENERAL STORE #14255

☐ SMALL CLAIMS**MEMORANDUM TO DEPARTMENT OF CIVIL RECORDS**
INSTRUCTIONS FOR ALIAS SUMMONS☐ PRIVATE PROCESS☒ CIVIL PROCESS☒ ISSUE ALIAS SUMMONS TO DEFENDANT

SERVE: Registered Agent CSC-Lawyers Incorporating

Service Company

221 Bolivar Street

Jefferson City, MO 65101

Cole

COUNTY OF SERVICE

CASE CONTINUED TO:

☐ PREPARE TRANSCRIPT OF JUDGMENT☐ AUTHENTICATED ☐ CERTIFIED ☐ RECORD AS LIEN
☐ W/LETTER**REQUESTED BY**

Martin M. Meyers #29524

NAME OF ☐ CREDITOR ☒ ATTORNEY & BAR NO.

4435 Main St., Suite 503

ADDRESS

Kansas City, MO 64111

CITY

STATE

ZIP

/s/ Martin M. Meyers

SIGNATURE

(816) 444-8500

PHONE

May 16, 2023

DATE

Please Provide Original & Copy



IN THE 16TH JUDICIAL CIRCUIT COURT, JACKSON COUNTY, MISSOURI

2023 JUN 27 PM 3:55

FILED - CIRCUIT COURT
JACKSON CO., MO

RECEIVED

JUN 06 2023

COLE COUNTY
SHERIFF'S OFFICE

Judge or Division: JERRI J ZHANG	Case Number: 2316-CV09221
Plaintiff/Petitioner: GERMANY SMITH	Plaintiff's/Petitioner's Attorney/Address EMMALEE ANN WILSON 4435 MAIN ST SUITE 503 KANSAS CITY, MO 64111
Defendant/Respondent: DOLGENCORP, LLC, D/B/A DOLLAR GENERAL STORE	Court Address: 415 E 12th KANSAS CITY, MO 64106
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COURT SEAL OF



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16-MAY-2023

Date

Further Information:

[Signature]
Clerk

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☒ (for service on a corporation) delivering a copy of the summons and petition to

CSC Lawyers Inc S.L. (name) Designee (title).

☐ other _____

Served at 350 E. High St (address)

in Cole (County/City of St. Louis), MO, on 06/07/23 (date) at 08:00 (time).

Sheriff John P. Wheeler

Printed Name of Sheriff or Server

(Seal)

by

[Signature]
Signature of Sheriff or Server

Must be sworn before a notary public if not served by an authorized officer:

Subscribed and sworn to before me on _____ (date).

My commission expires: _____ Date _____ Notary Public

Sheriff's Fees

Summons \$ _____
 Non Est \$ _____
 Sheriff's Deputy Salary \$ 10.00
 Supplemental Surcharge \$ _____ (_____ miles @ \$_____ per mile)
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 Total \$ _____

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[Handwritten initials]

①